

David Allegrucci (#12611)  
**Allegrucci Law Office, PLLC**  
307 North Miller Road  
Buckeye, AZ. 85326  
PH (623) 412-2330  
FAX (623) 878-9807  
david.allegrucci@azbar.org  
Attorney for Petitioner(s)

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF ARIZONA

In re:	)	Case No.: 2-17-bk-04023-BKM
	)	In Proceedings Under Chapter 13
DANIELLE MARIE PETERSON,	)	
and	)	<b>SECOND MOTION FOR THIRTY (30)</b>
AARON JAMES PETERSON,	)	<b>DAY EXTENSION TO COMPLY WITH</b>
	)	<b>TRUSTEE'S EVALUATION AND</b>
Debtor(s).	)	<b>RECOMMENDATION(S) REPORT WITH</b>
	)	<b>NOTICE OF POTENTIAL DISMISSAL IF</b>
	)	<b>CONDITIONS ARE NOT SATISFIED RE:</b>
	)	<b>AMENDED CHAPTER 13 PLAN (Case</b>
	)	<b>Docket #11) ... and NOTICE OF BAR</b>
	)	<b>DATE TO OBJECT TO THE SAME</b>

NOW COMES Petitioner(s), DANIELLE MARIE PETERSON and AARON JAMES PETERSON, (hereinafter "Movant(s)") by and through counsel, who moves the Court to grant a thirty (30) day extension to respond with the " Trustee's Evaluation and Recommendation Report ...", case docket number 18, (hereinafter "Recommendation") and present a proposed confirmation order to the Chapter 13 Trustee. The grounds for this request are set forth within the Memorandum below.

RESPECTFULLY SUBMITTED this 20th day of November, 2017.

Allegrucci Law Office, PLLC

/s/ David Allegrucci  
Attorney for Petitioner(s)

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

**MEMORANDUM**

1. Since the date of the last hearing on this case undersigned counsel has been involved in the following matters:

- Was a court appointed arbitrator in case number CV2016-90817 for a hearing held on September 13, 2017.
- Prepared for a trial scheduled on September 18, 2017 in case number CC2016-086696 which settled 3 business days prior to trial.
- Prepared for trial in adversary number 2-16-ap-00327-DPC which was vacated as a result of the illness of the client.
- Drafted Motion in support of Application for Default in adversary number 2-16-ap-000249-MCW.
- Drafted brief in support of standing to continue with appeal on October 12, 2017 in AZ-16-1263-SKuf.
- Drafted and filed a contested response to a motion for stay relief in case number 2-15-bk-04538-GBN on October 18, 2017.
- Prepared for and attended oral argument in Appellate number AZ-16-1263 on October 26, 2017.
- Read Motion for Reconsideration and Additur and Objection thereto as court ordered arbitrator in CV2016-90817 and rendered Award on November 5, 2017.
- Filed Motion to Set Chapter 13 Trustee's objection to confirmation for hearing in 2:16-bk-12633-BMW on November 6, 2017.
- Drafted and filed a Reply Brief in Appellate number AZ-17-1215 on November 7, 2017.
- Drafted and filed Motion to set Trustee's Supplemental Recommendation for hearing in case number 2-15-bk-2060-EPB on November 13, 2017.
- Prepared for objection to confirmation order and attended Chapter 11 confirmation hearing in case number 2-16-06224-MCW on November 15, 2017.
- Prepared for trial and pretrial conference in US Tax Court case number 6037-17S. Matter settled on November 17, 2017.

1 2. During the aforementioned time period undersigned legal counsel prepared  
2 or submitted responses to plan recommendations to the Chapter 13 trustee plan  
3 assigned to the case in case(s) numbered 2-15-bk-07706-BMW and 2-15-00984-GBN.  
4

5 3. A thirty (30) day continuance should allow the Movant(s) to sort out their  
6 new financial arrangements and ensure they have plan feasibility going forward.

7 4. During the next thirty (30) days, barring unforeseen events, the undersigned  
8 believes he can start working on the Recommendation.

9 WHEREFORE, based upon the foregoing, the Movant(s) pray that this Court:

10 a) grant him a thirty (30) day extension to respond to  
11 the Recommendation and submit a proposed  
confirmation order to the Chapter 13 Trustee;

12 b) grant such other and further relief as the Court  
13 deems just and equitable.

14 Allegrucci Law Office, PLLC

15 /s/ David Allegrucci  
16 Attorney for Defendant(s)

17 **NOTICE OF DEADLINE TO FILE OBJECTION TO MOTION**

18 NOTICE is given that Movant(s) have filed the foregoing Motion for Extension of  
19 Time.

20 5. Any objections to the Motion must be in writing, filed with the Clerk of  
the U.S. Bankruptcy Court, and copies served on the following parties no later than  
fourteen (14) days from the date of this Notice.

21 Clerk of the U.S. Bankruptcy Court  
22 230 North First Avenue, Suite 101  
Phoenix, AZ 85012

Danielle M. Peterson  
320 North 85th Street  
Mesa, AZ 85207  
Movant(s)

23 Mr. David Allegrucci  
24 ALLEGUCCI LAW OFFICE, PLLC  
307 North Miller Road  
25 Buckeye, AZ 85326  
Attorney for Movant(s)

Aaron J. Peterson  
975 S. Royal Palm Rd., #E207  
Apache Junction, AZ 85119  
Movant(s)

6. If no objections are filed the Motion can be approved without a hearing.

7. If objections are filed, this Motion can be approved without a hearing provided that the Trustee and all objecting creditors agree to a stipulated approval order. If unable to so agree and stipulate, the Debtor's Attorney will give notice of a hearing to the Trustee.

DATED: November 20, 2017.

Allegrucci Law Office, PLLC

/s/ David Allegrucci  
Attorney for Movant(s)

Copy of the foregoing  
sent this 21st day of  
November, 2017 by first  
class U.S. Mail to the  
following:

Mr. Edward J. Maney  
Suite 1775  
101 North First Avenue  
Phoenix, AZ 85003  
Attorney for Trustee

/s/ David Allegrucci